

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 1071 and 1375

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
SIXTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reduced and Reclassified Claims, Reclassified Claims,
Substantive Duplicate Claims, Cross-Debtor Duplicate Claims)**

The undersigned counsel to Plan Administrator in the above-captioned cases hereby certifies as follows:

1. On June 4, 2025, the *Debtors’ Sixth Omnibus Objection to Certain Claims (Substantive) (Reduced and Reclassified Claims, Reclassified Claims, Substantive Duplicate Claims, Cross-Debtor Duplicate Claims)* [Docket No. 1071] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order as granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was June 25, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Response Deadline, the Debtors received an informal response from Exmart International Private Limited (the “Exmart”).

4. On July 9, 2025, the Debtors filed a *Certification of Counsel Regarding Debtors' Sixth Omnibus Objection to Certain Claims (Substantive) (Reduced and Reclassified Claims, Reclassified Claims, Substantive Duplicate Claims, Cross-Debtor Duplicate Claims)* [Docket No. 1375] adjourning the informal response of Exmart to the omnibus hearing scheduled for August 14, 2025.

5. Counsel to Exmart has agreed to entry of the Proposed Order with respect to the claim of Exmart, a copy of which is attached hereto as **Exhibit A**.

6. The Plan Administrator respectfully requests that the Court enter the Proposed Order at its earliest convenience.

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Dated: August 12, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Jack M. Dougherty (No. 6784)
Michael E. Fitzpatrick (No. 6797)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
jdougherty@coleschotz.com
mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)
200 Public Square, Suite 2800
Cleveland, Ohio 44114
Telephone: (216) 274-2489
Facsimile: (216) 241-2824
Email: cwick@hahnlaw.com

Co-Counsel to the Plan Administrator